



FOOTHILL MUNICIPAL WATER DISTRICT

ALTADENA • La CAÑADA FLINTRIDGE • La CRESCENTA

January 22, 2014

Peter Brostrom
Water Use and Efficiency Branch
Division of Statewide Integrated Water Management
California Department of Water Resources

Subject: Draft ITP UWMP Report

Dear Mr. Brostrom:

Foothill Municipal Water District (FMWD or District) appreciates the opportunity to comment on the Draft ITP UWMP Report. FMWD operates as a wholesale water utility that distributes imported water it receives from the Metropolitan Water District of Southern California (MWD) to seven retailing water agencies located across three communities in the foothills of the San Gabriel Mountains. The District's service area is approximately 22 square miles and encompasses the Los Angeles County unincorporated areas of La Crescenta-Montrose and Altadena, including the incorporated urban area of La Cañada Flintridge.

FMWD would like a modification to the report's recommendation to require distribution system water loss reporting in UWMPs. FMWD is one of a unique class of water agencies that does not experience distribution system water losses. By virtue of design, the FMWD distribution system cycles through imported water at an expeditious rate with member agency service connections and metering configurations that are calibrated within a very narrow range. In fact it might even be appropriate to categorize imported water deliveries through the FMWD distribution system as water system gains. Also, due to the highly pressurized nature of the FMWD distribution system, a significant leak or main burst would unquestionably be noticed, the system shutdown and repairs made immediately. Thus, we ask that the report be modified for system gains as well as losses.

The District requests that this recommendation be amended to include an exemption for water agencies that do not experience distribution system water losses. From a reporting obligation standpoint, FMWD believes that a written explanation of the makeup and design of its distribution system should satisfy DWR and this potential UWMP requirement.

If you have any questions, please contact me at (818) 790-4046 or at njazmadarian@fmwd.com.

Sincerely,

Nina Jazmadarian
General Manager
Foothill Municipal Water District